

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	COMPLAINT FELONY	DISTRICT: CIRCUIT: CTN: 97-26900506-01 AGHC #: 2025-0441614
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District Court ORI: **MI820365J**
421 Madison Detroit, MI 48226 313-965-2400

Circuit Court ORI: **MI821095J**
WAYNE COUNTY JUDICIAL CENTER 5301 RUSSELL
ST Detroit, Michigan 48211 313-224-2520

AGHC ORI: **MI330035A**

THE PEOPLE OF THE STATE OF MICHIGAN		V Defendant's name and address WAYNE NORBERT WHITE [REDACTED] DETROIT, MI [REDACTED]		Victim or complainant STATE OF MICHIGAN	
				Complaining Witness SA SCOTT SHEA	
Co-defendant(s) (If known)				Date: On or about AUGUST 2024 - APRIL 2025	
City/Twp./Village DETROIT		County in Michigan WAYNE	Defendant TCN	Defendant CTN 97-26900506-01	Defendant SID 1320187E
Defendant DOB Put DOB in Ref. No. row 1 on MC 97	Defendant DLN Put DLN in Ref. No. row 3 on MC 97		DLN Type: Oper./Chauf	Vehicle Type	Defendant Sex M Defendant Race B
Police agency report no. HC 2025-0441614		Charge See below			Maximum penalty See below
[1 A sample for chemical testing for DNA identification profiling is on file with the Michigan State Police from a previous case.					

Witnesses

State of Michigan SA Scott Shea

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date and at City of Detroit, the defendant, contrary to law,

COUNT 1: LARCENY BY CONVERSION - \$20,000.00 OR MORE

on or about February 26, 2025 did, being a person to whom money had been delivered, embezzle or fraudulently convert to his/her own use that property, which belonged to Detroit Wayne Integrated Health Network, the value of the property was \$20,000.00 or more; contrary to MCL 750.362. [750.3622A]

FELONY: 10 Years and/or \$15,000.00, or 3 times the value of the property stolen, whichever is greater (see MCL 750.356(2)(a)). To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co. v United States* 567 U.S. ____; No. 11-94 (2012).

COUNT 2: LARCENY BY CONVERSION - \$20,000.00 OR MORE

on or about March 27, 2025 did, being a person to whom money had been delivered, embezzle or fraudulently convert to his/her own use that property, which belonged to Detroit Wayne Integrated Health Network, the value of the property was \$20,000.00 or more; contrary to MCL 750.362. [750.3622A]

FELONY: 10 Years and/or \$15,000.00, or 3 times the value of the property stolen, whichever is greater (see MCL 750.356(2)(a)). To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co. v United States* 567 U.S. ____; No. 11-94 (2012).

COUNT 3: LARCENY BY CONVERSION - \$20,000.00 OR MORE

on or about April 10, 2025 did, being a person to whom money had been delivered, embezzle or fraudulently convert to his/her own use that property, which belonged to Detroit Wayne Integrated Health Network, the value of the property was \$20,000.00 or more; contrary to MCL 750.362. [750.3622A]

FELONY: 10 Years and/or \$15,000.00, or 3 times the value of the property stolen, whichever is greater (see MCL 750.356(2)(a)). To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co. v United States* 567 U.S. ____; No. 11-94 (2012).

Court shall order law enforcement to collect a DNA identification profiling sample before sentencing or disposition, if not taken at arrest.

The complaining witness asks that the defendant be apprehended and dealt with according to law.

Warrant authorized on <u>06/12/2026</u> by:  Date
David Tanay (P55654) Division Chief, Health Care Fraud Division P.O. Box 30758, Lansing, MI 48909 517-241-6565
☐ Security for costs posted

MC 200w (4/25) FELONY SET, Complaint (PACC-PAAM Replacement)

I declare under the penalties of perjury that this complaint has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

 Complaining Witness Signature
06/17/2026 Date

MCL 764.1 et seq., MCL 766.1 et seq., MCL 767.1 et seq., MCR 6.101
MCR 6.102